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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER
IN SUPPORT OF DEFENDANT META
PLATFORMS INC.'S MOTION TO
EXCLUDE EXPERT TESTIMONY AND
OPINIONS OF MICHAEL WILLIAMS**

Judge: Hon. James Donato

1 I, DAVID Z. GRINGER, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this
4 declaration in support of Meta's Motion to Exclude Expert Testimony and Opinions of Michael
5 Williams.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Merits
7 Report of Michael A. Williams, dated January 12, 2024.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of the Expert Merits
9 Rebuttal Report of Michael A. Williams, dated February 9, 2024.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the transcript
11 from Michael A. Williams' merits deposition, held on February 23, 2024.

12 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the transcript
13 from Michael A. Williams' class certification deposition, held on September 26, 2023.

14 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the transcript
15 from Kevin Kreitzman's merits deposition, held on March 6, 2024.

16 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the transcript
17 from Kevin Kreitzman's class certification deposition, held on October 2, 2023.

18 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the transcript
19 from Scott Fasser's class certification deposition, held on September 7, 2023.

20 9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the transcript
21 from Joshua Gans' class certification deposition, held on September 26, 2023.

22 I declare that the foregoing is true and correct under penalty of perjury.

23 Executed on this 5th day of April, 2024, in New York, New York.

24 By: /s/ David Z. Gringer
25 David Z. Gringer
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SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta
Sonal N. Mehta